

VENETZ, TED
PAGE 1 OF 1

Public Comment to DOE's Materials Disposition EIS
 Richland Public Meeting, August 4, 1998

I disagree with the statement that siting the MOX fuel fabrication facility at Hanford would interfere with the cleanup mission. I believe it would in fact complement it. For example:

A continuing federal interest in the site, such as future site use for material Disposition Activities, is a definitive way to ensure a continued commitment to site cleanup.

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A new Materials Disposition mission would share some of the overhead and infrastructure costs for the site, freeing more of the site cleanup budget and resources for actual cleanup work.

Use of the Hanford site FMEF facility would save hundred of millions of taxpayer dollars over the alternatives that involve construction of new facilities. As Congress appears unwilling to increase the overall DOE budget, this money would likely come out of existing budget at the expense of cleanup programs, including those at Hanford.

2

Ted Venetz
 1101 So Irby
 Kennewick, WA

WAD23

WAD23-1

Alternatives

DOE acknowledges the commentor's support for siting the MOX facility at Hanford. DOE believes that Hanford's efforts should remain focused on its current high-priority cleanup mission. The importance of cleanup at Hanford was taken into consideration in identifying preferred sites for surplus plutonium disposition activities. However, no decision has been made, and DOE will continue to consider Hanford for surplus plutonium disposition or other programs that are compatible with the Hanford mission.

WAD23-2

Cost

Funds for the surplus plutonium disposition program and the environmental cleanup program come from different appropriation accounts allocated by the U.S. Congress that cannot be used interchangeably.

Because cost issues are beyond the scope of this SPD EIS, this comment has been forwarded to the cost analysis team for consideration. The *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998) report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

I oppose the MOX facility at the Hanford Site for the following reasons:

1. Politically impossible to get approval in PacNW, the delays & ill-will would threaten the DOE itself.
2. Other than WPPSS who would burn the fuel? Transport out of here would be impossible
3. Other states (TX or SC) actually want the project, and have powerplants close by to burn it.
4. This dilutes the basic mission at the Hanford Site, which should be to “clean it up and shut it down”, period.

1

WD005

WD005-1

Alternatives

DOE acknowledges the commentor’s opposition to siting the MOX facility at Hanford. DOE believes that Hanford’s efforts should remain focused on its current high-priority cleanup mission. The importance of cleanup at Hanford was taken into consideration in identifying preferred sites for surplus plutonium disposition activities. However, no decision has been made, and DOE will continue to consider Hanford for surplus plutonium disposition or other programs that are compatible with the Hanford mission.

WASHINGTON, OFFICE OF THE GOVERNOR
HONORABLE GARY LOCKE
PAGE 1 OF 1

GARY LOCKE
 Governor



COPY

STATE OF WASHINGTON
 OFFICE OF THE GOVERNOR

P.O. Box 40002 • Olympia, Washington 98504-0002 • (360) 753-6780 • TTY/TDD (360) 753-6466

April 30, 1998

The Honorable Federico Peña, Secretary
 U.S. Department of Energy
 1000 Independence Avenue SW
 Washington, D.C. 20585

Dear Secretary Peña:

This letter is a follow-up to our discussions earlier this year regarding Hanford.

Department of Energy (Department) compliance with the cleanup program commitments contained in the Tri-Party Agreement (TPA) is of overriding concern to the citizens of Washington state. As I have previously stated, the Department must demonstrate a commitment to the achievement of the TPA milestones and cleanup goals before we can support new programs at Hanford. In particular, effective progress must be made in the removal of spent fuel from the K-Reactor basins and treatment of the tank wastes. Washington State needs the Department to advocate strongly for budgets which will move us ahead in these areas and we need to see substantive progress in these areas this year.

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I recognize Hanford is potentially a valuable asset for the Department of Energy. The Hanford site can continue to make a contribution, providing that new programs not interfere with the Department's cleanup responsibilities. Just as Hanford fulfilled a critical role for the nation during World War II and the Cold War, we know it could contribute toward international disarmament regarding plutonium disposition. I have also indicated my support for the medical isotope mission for the Fast Flux Test Facility, recognizing tritium production would serve as an interim bridge to meet this goal.

2

In looking ahead at these issues, it would be very helpful to see how the Department proposes to allocate new missions across its facilities nationwide. Washington has served as one of the nation's principal facilities for production of nuclear weapons, an activity that has left us with two-thirds of the Department's high level radioactive waste and seventy-five percent of its spent nuclear fuel. Washington is willing to do its share, but there must be a fully shared responsibility in this regard with other facilities across the country.

3

I look forward to working with the Department of Energy on these issues in the future.

Sincerely,

Gary Locke
 Governor

WAD19

WAD19-1

DOE Policy

DOE acknowledges the Governor's concern that Tri-Party Agreement commitments be met before new programs at Hanford be initiated. As stated in Chapter 5, it is DOE's policy to conduct its operations in an environmentally safe manner in compliance with all applicable statutes, regulations, and standards, which include the Tri-Party Agreement.

WAD19-2

DOE Policy

DOE acknowledges the Governor's support for siting the proposed surplus plutonium disposition facilities at Hanford. DOE believes that Hanford's efforts should remain focused on its current high-priority cleanup mission. The importance of cleanup at Hanford was taken into consideration in identifying preferred sites for surplus plutonium disposition activities. However, no decision has been made, and DOE will continue to consider Hanford for surplus plutonium disposition or other programs that are compatible with the Hanford mission, especially in regard to the use of existing facilities.

WAD19-3

DOE Policy

Section 4.32.1 takes into consideration existing missions (e.g., cleanup at Hanford) at candidate sites, as well as analyzes the potential cumulative impacts of surplus plutonium disposition activities and other programs' current (as well as past and reasonably foreseeable future) activities at the sites. DOE's various program offices individually develop strategic planning documents for their programs. For example, the Office of Environmental Management, whose mission is to manage the HLW and spent nuclear fuel, recently issued *Accelerating Cleanup: Paths to Closure* (DOE/EM-0362, June 1998).

WEST RICHLAND
HONORABLE KEN DOBBIN
PAGE 1 OF 1

Pu Disposition EIS Public Hearing in Richland WA

8-4-98

I am Ken Dobbin, Councilman from the City of West Richland.

I represent a public fed up with government tax and squander policies.

DOE, what part of NO don't you understand?

The public says NO to ignoring Hanford facilities just to rebuild them in another state.

The Fuels and Materials Examination Facility (FMEF) here at Hanford is well suited to the MOX mission and represents at least \$500M of the taxpayers' resources that they want you to utilize.

Those of us who have spent the last 4 years working on restarting the Fast Flux Test Facility (FFTF) in the battle on cancer continue to hear that the DOE funding is a zero-sum game.

If so, where will the funds come from you plan to squander on the MOX mission?

Will you eventually tell us cancer fighters that there is no money to restart the FFTF?

The resources saved by using Hanford facilities for plutonium disposition could operate the FFTF in the fight on cancer for a decade. That takes us past the 8-year breakeven point on medical isotope revenues for the FFTF.

DOE, are you telling us cancer fighters that you have additional money to restart the FFTF, or are you telling us that you will let those with cancer continue to suffer and die?

I represent a public that wants answers!

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WAD24

WAD24-1

Alternatives

DOE acknowledges the commentor's support for siting the MOX facility in FMEF at Hanford. DOE believes that Hanford's efforts should remain focused on its current high-priority cleanup mission. The importance of cleanup at Hanford was taken into consideration in identifying preferred sites for surplus plutonium disposition activities. However, no decision has been made, and DOE will continue to consider Hanford for surplus plutonium disposition or other programs that are compatible with the Hanford mission, especially in regard to the use of existing facilities.

As discussed in Section 1.7.4, Appendix D was deleted because none of the proposals to restart FFTF currently consider the use of surplus plutonium as a fuel source. In December 1998, the Secretary of Energy decided that FFTF would not play a role in producing tritium.

Because cost issues are beyond the scope of this SPD EIS, this comment has been forwarded to the cost analysis team for consideration. The *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998) report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

WEST RICHLAND
HONORABLE JERRY A. PELTIER
PAGE 1 OF 1



CITY OF WEST RICHLAND

3801 Van Giesen St. ♦ West Richland, WA 99353 ♦ Tele: (509) 967-3431 ♦ FAX (509) 967-2251

TESTIMONY OF JERRY A. PELTIER, MAYOR
 CITY OF WEST RICHLAND, WASHINGTON

Regarding the Draft Environmental Impact Statement for Plutonium Disposition

One year ago the Department of Energy held scoping meetings on the Surplus Plutonium Disposition Environmental Impact Statement. At those meetings in Richland, a clear message was delivered to the Department. "We want an objective, unbiased assessment of all of the Plutonium disposition challenges and opportunities. Pre-determined outcomes must not drive the EIS and Record of Decision process." The Draft EIS in front of us today is an excellent example of a technical justification of a pre-determined outcome. I would think, with the Department of Energy's current standings with the Congress of the United States, that every effort possible would have been made to write a balance and unbiased document. This draft EIS should be withdrawn and revised to give a fair evaluation of each of the alternatives.

- The EIS does NOT address comparable costs, especially the Fuels and Materials Examination Facility (FMEF) at Hanford.
- The EIS is clearly not a balanced and objective assessment.
- An objective evaluation of comparable disposal programs must be made.
- Misrepresents Hanford by a claim that an additional facility would be required, when in fact both the Pit Disassembly and MOX fuel could be performed in the same facility.
- Ignores the potential cost savings of co-locating the Pit Disassembly and Mox in the same facility.
- Does not address, with the current flat and/or declining budgets, how the additional costs of Plutonium disposition will be programed.

Let me conclude by saying once again I am very disappointed in the Department of Energy's process for developing this EIS. We pre-determined a year ago, based on the political climate, what this EIS was going to say. Believe me the Department has not let us down, this draft EIS is political statement that ignores the tax payers best interest. Hanford is a proud community and we have paid an enormous price in the name of National Defense. We feel that we deserve a fair and unbiased evaluation in regard to Plutonium Disposition.

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WAD17

WAD17-1

General SPD EIS and NEPA Process

DOE acknowledges the commentor's support for siting the proposed surplus plutonium disposition facilities at Hanford. DOE has prepared this SPD EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR 1500 through 1508 and 10 CFR 1021, respectively). The primary objective of the EIS is a comprehensive description of proposed surplus plutonium disposition actions and alternatives and their potential environmental impacts. DOE has analyzed each environmental resource area in a consistent manner across all the alternatives to allow for a fair comparison among the alternatives and among the candidate sites for surplus plutonium disposition facilities. Section 2.10.2 describes Alternative 6B which involves collocating the pit conversion and MOX facilities in FMEF and Section 4.11 presents the potential environmental impacts.

DOE believes that Hanford's efforts should remain focused on its current high-priority cleanup mission. The importance of cleanup at Hanford was taken into consideration in identifying preferred sites for surplus plutonium disposition activities. However, no decision has been made, and DOE will continue to consider Hanford for surplus plutonium disposition or other programs that are compatible with the Hanford mission, especially in regard to the use of existing facilities.

Because cost issues are beyond the scope of this SPD EIS, this comment has been forwarded to the cost analysis team for response. The *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998) report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

YOUNG, TIM, ET AL.
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SEPT 16, 1998

TO: USDOE, Office of Fissile Materials Disposition,
MD-4 Forrestal Building
1000 Independence Ave., Washington, D.C. 20585

FROM: Tim Young and MB Condon
380 Ilsa Way, Goldendale, WA 98620

RE: Surplus Plutonium Draft EIS

Enclosed is a written text of our comments regarding the SPDEIS. These comments were left by voice on the answering machine at 1-800-820-5156 on Sept. 16, 1998 after we were unable to transmit them by fax to your office. Clearer instructions for sending a fax in your message would be helpful.

Tim Young

MD246

FOR THE PUBLIC RECORD

SEPT 16, 1998

TO: USDOE, Office of Fissile Materials Disposition,
MD-4 Forrestal Building
1000 Independence Ave., Washington, D.C. 20585

FROM: Tim Young and MB Condon
380 Iisa Way, Goldendale, WA 98620

RE: Surplus Plutonium Draft EIS

We want the following questions, concerns, and assumptions addressed in the SPD EIS:

1. What classified toxic elements are contained in nuclear warhead pits and how much toxic pollution is going to be created by the separation of those elements from plutonium? Where are the toxic waste products going to be stored and how are they going to be handled? 1
2. Which specific reactors in the US are going to be licensed to "burn" plutonium? How are reactors that were never designed for this fuel going to be tested and certified before allowing plutonium radiation to be generated by them? How are the safety records of commercial reactor operators going to be factored into the decisions to allow them to use plutonium as a reactor fuel? Why should reactors that are scheduled for de-commissioning be allowed to continue operating beyond their scheduled life span and then be allowed to utilize a fuel they were never designed to burn? 2
3. Specifically, how much radioactive waste will be created by each step of plutonium reprocessing, from the removal of plutonium oxide from bomb cores, the creation of MOX fuels, the transportation of all radioactive materials including the waste products, to the generation of electricity and possibly the production of tritium? How much more radioactive waste will be generated by each reactor that would be allowed to operate beyond its de-commissioning date, compared to the amount of radioactive waste created if the reactors were retired on schedule? 3
4. How are DOE and the commercial reactor operators going to protect the public and the environment from the radioactive hazards posed by the generation of more nuclear waste from the burning of MOX fuels, when both the DOE and commercial operators have no idea of how to protect the public and the environment from the radiation hazards presently posed by the burning of uranium in reactors? 4
5. What specific transportation means and routes will be used to transport the weapons grade plutonium, MOX fuels, and the resulting nuclear and toxic waste? How will the public be notified, so their elected officials can participate in the creation of disaster plans in the case of a 5

MD246

MD246-1

Pit Disassembly and Conversion

A pit is made of plutonium, which consists mainly of the isotope plutonium 239. Pit plutonium can contain trace amounts of a variety of hazardous impurities such as beryllium and lead. These contaminants are expected to remain entrained in the plutonium dioxide material. The very low levels of contaminants do not adversely affect the immobilization and MOX approaches, and inclusion of the polishing step in the MOX facility would remove much of the contaminants. Some pits may also be contaminated with tritium, a radioisotope of hydrogen which can be removed by heating the pit material in a vacuum furnace to drive off the tritium gas. Another element which may be present in pit plutonium at low levels, but above trace amounts, is gallium, which is added as an alloying agent. Because high levels of gallium may adversely affect MOX fuel performance, it is largely removed during the pit conversion process, as discussed in Section 2.4.3.2. The pit conversion process would generate some LLW and TRU waste and a very small amount of mixed LLW and hazardous waste. These wastes include spent filters, used containers and equipment, paper and cloth wipes, protective clothing, shielding, solvents, and cleaning solutions. In general, these wastes contribute to less than 4 percent of the existing wastes at all the candidate sites and would be handled as part of the site waste management practice. A description of waste generation and management is provided in Appendix H.

MD246-2

MOX Approach

Although no U.S. commercial reactors are licensed to use plutonium-based fuel, several are designed to use MOX fuel, and others can easily accommodate a partial MOX core. Therefore, DOE conducted a procurement process to acquire MOX fuel fabrication and irradiation services. As a result of this procurement, DOE identified Catawba, McGuire, and North Anna as the reactors proposed to irradiate MOX fuel as part of the proposed action in this SPD EIS. In accordance with a stipulation of its RFP for MOX Fuel Fabrication and Reactor Irradiation Services, these are new reactors, that is, reactors whose operational life is expected to last beyond the life of the surplus plutonium disposition program. The selected team, DCS, would have to apply for a reactor operating license amendment for each individual reactor

before it can use MOX fuel. For this amendment, the licensee would have to demonstrate that all safety, testing, and environmental impacts have been addressed as well as complete the public hearing process. In addition, NRC would evaluate license applications and monitor the operations of both the MOX facility and the commercial reactors selected to use MOX fuel to ensure adequate margins of safety. Section 4.28 was revised to provide reactor-specific analyses and discuss the potential environmental impacts of using a partial MOX core during routine operations and reactor accidents.

MD246-3

Waste Management

DOE acknowledges the commentors' concerns regarding waste generation and management. Waste streams that would be generated by the pit conversion, immobilization, and MOX facilities are detailed in the Waste Management sections in Chapter 4 of Volume I and Appendix H. As described in Sections 2.18.3 and 4.28.2.8, additional spent fuel would be produced by using MOX fuel instead of LEU fuel in domestic, commercial reactors. Spent fuel management at the proposed reactor sites is not expected to change dramatically due to the substitution of MOX assemblies for some of the LEU assemblies. Likewise, the additional spent fuel would be a very small fraction of the total that would be managed at the potential geologic repository.

The transportation requirements for the surplus plutonium disposition program are also evaluated in this SPD EIS. The shipment of waste will be done in accordance with the decisions reached on the *Final Waste Management Programmatic Environmental Impact Statement for Managing Treatment, Storage, and Disposal of Radioactive and Hazardous Waste* (DOE/EIS-0200-F, May 1997) and the *WIPP Disposal Phase Final Supplemental EIS* (DOE/EIS-0026-S-2, September 1997).

The production of tritium in a commercial light water reactor is being evaluated in a separate DOE EIS, *Final EIS for the Production of Tritium in a Commercial Light Water Reactor* (DOE/EIS-0288, March 1999).

In choosing reactors to use the MOX fuel fabricated under the surplus plutonium disposition program, DOE looked at the criteria of reactor age. DOE chose only reactors whose planned operating life extended through the full life cycle of the surplus plutonium disposition program.

MD246-4**Human Health Risk**

DOE and NRC are committed to protecting the health and safety of the public. This includes designing, constructing, and operating DOE- and NRC-regulated facilities (e.g., domestic, commercial reactors) in such a way as to continually provide a level of safety and reliability that meets or exceeds established standards. DOE and commercial reactors also have plans and programs for the safe management and ultimate disposal of their nuclear waste. Section 4.28 addresses the issue of waste generation by those domestic, commercial reactors designated to irradiate MOX fuel.

The remainder of this comment is addressed in the spent fuel portion of response MD246-3.

MD246-5**Transportation**

DOE anticipates that transportation of plutonium pits, nonpit plutonium, MOX fuel, and HEU (i.e., special nuclear materials) required to disposition surplus plutonium would be done through the DOE Transportation Safeguards Division using SST/SGTs as described in Appendix L.3.2. The shipment of nuclear material (e.g., depleted uranium) using commercial carriers would be the subject of detailed transportation plans in which routes and specific processing locations would be discussed. These plans are coordinated with State, tribal, and local officials. For emergency response planning, all shipments are coordinated with appropriate law enforcement and public safety agencies. If requested, DOE will assist these officials with response plans, and, if necessary, with resources in accordance with DOE Order 5530.3. DOE has developed and implemented a Radiological Assistance Program to provide assistance in all types of radiological accidents. Through this coordination and liaison program, DOE offers in-depth briefing at the State level.

The transportation of depleted uranium oxide and waste (i.e., non-special nuclear materials) would be done using commercial carriers. Nuclear material shipments must comply with both NRC and DOT regulatory requirements. Appendix L.3.3 provides details on the transportation of this type of materials and the transportation route selection process. DOT routing regulations require that shipments of radioactive material be transported over a preferred highway network including interstate highways, with preference toward bypasses around cities, and State-designated preferred routes.

mishap? What specific plans are in place for nuclear mishaps along the transportation routes and are they adequate to protect the public, crops, livestock, and the environment from exposure in the case of an accident or intentional destructive act?

5

We are totally opposed to the reprocessing of weapons-grade plutonium into MOX fuels to be burned in commercial nuclear reactors. Furthermore there should be no taxpayer subsidies to commercial operators to allow them to use MOX fuels in reactors that were never designed to do so and to allow the life of reactors to be extended beyond their scheduled de-commissioning date.

The DOE and the commercial nuclear industry should not be allowed to initiate any programs that will create more radioactive and toxic waste when the technology doesn't exist to deactivate and neutralize the waste created over the last fifty years by industry and the government.

6

We support the isolation and vitrification of weapons-grade plutonium. Although this is an inadequate solution to the radioactive waste problem, it at least, offers some assurance that these materials won't find their way into nuclear weapons in the future.

Finally, we have no confidence in the DOE's ability to safely and securely transport weapons-grade plutonium and MOX fuels to reactor sites. The public and their elected representatives are totally uninformed and unprepared for any nuclear mishaps that could result and we don't think that the DOE or the nuclear industry has the will or the resources to adequately prepare the public for the possible dangers that these materials represent to their communities.

7

We are also unwilling to give up any of our rights so that these materials can be moved "securely" through our communities.

Tim Young and MB Condon

Tim Young
MB Condon

MD246

The dates and times that specific transportation routes would be used for special nuclear materials are classified information; however, the number of shipments that would be required, by location, has been included in this SPD EIS. Additional details are provided in *Fissile Materials Disposition Program SST/SGT Transportation Estimation* (SAND98-8244, June 1998), which is available on the MD Web site at <http://www.doe-md.com>.

MD246-6

Alternatives

DOE acknowledges the commentors' opposition to the MOX approach and support for the immobilization approach to surplus plutonium disposition.

U.S. policy dating back to the Ford Administration has prohibited the commercial, chemical reprocessing and separation of plutonium from spent nuclear fuel. The use of U.S. surplus plutonium in existing domestic, commercial reactors does not involve reprocessing (reprocessing is a chemical separation of uranium, transuranic elements [including plutonium], and fission products from spent reactor fuel and the reuse of the plutonium and uranium to produce new fresh fuel). The proposed use of MOX fuel is consistent with the U.S. nonproliferation policy and would ensure that plutonium which was produced for nuclear weapons and subsequently declared excess to national security needs is never again used for nuclear weapons.

Use of MOX fuel in domestic, commercial reactors is not proposed in order to subsidize the commercial nuclear power industry. Rather, the purpose of this proposed action is to safely and securely disposition surplus plutonium by meeting the Spent Fuel Standard. The Spent Fuel Standard, as identified by NAS and modified by DOE, is to make the surplus weapons-usable plutonium as inaccessible and unattractive for weapons use as the much larger and growing quantity of plutonium that exists in spent nuclear fuel from commercial power reactors. The MOX facility would produce nuclear fuel that would displace LEU fuel that utilities would have otherwise purchased. If the effective value of the MOX fuel exceeds the cost of the LEU fuel that it displaced, then the contract provides that money would be paid back to the U.S. Government by DCS based on a formula included in the DCS contract. The commercial reactors selected for the MOX approach include only those reactors whose

operational life is expected to last beyond the life of the surplus plutonium disposition program.

Although cost will be a factor in the decisionmaking process, this SPD EIS contains environmental impact data and does not address the costs associated with the various alternatives. A separate report, *Cost Analysis in Support of Site Selection for Surplus Weapons-Usable Plutonium Disposition* (DOE/MD-0009, July 1998), which analyzes the cost and schedule estimates for each alternative, was made available around the same time as the SPD Draft EIS. This report and the *Plutonium Disposition Life-Cycle Costs and Cost-Related Comment Resolution Document* (DOE/MD-0013, November 1999), which covers recent life-cycle cost analyses associated with the preferred alternative, are available on the MD Web site at <http://www.doe-md.com> and in the public reading rooms at the following locations: Hanford, INEEL, Pantex, SRS, and Washington, D.C.

DOE has identified as its preferred alternative the hybrid approach. Pursuing both immobilization and MOX fuel fabrication provides the United States important insurance against potential disadvantages of implementing either approach by itself. The hybrid approach also provides the best opportunity for U.S. leadership in working with Russia to implement similar options for reducing Russia's excess plutonium in parallel. Further, it sends the strongest possible signal to the world of U.S. determination to reduce stockpiles of surplus plutonium as quickly as possible and in a manner that would make it technically difficult to use the plutonium in nuclear weapons again.

MD246-7

DOE Policy

It is DOE's policy that plutonium shipments must comply with applicable DOT and NRC regulatory requirements. The highway routing of nuclear material is systematically determined according to DOT regulations 49 CFR 171 through 179 and 49 CFR 397 for commercial shipments. Transportation of special nuclear materials, including fresh MOX fuel, would use DOE's SST/SGT system. Since the establishment of the DOE Transportation Safeguards Division in 1975, the SST/SGT system has transported DOE-owned cargo over more than 151 million km (94 million mi) with no accidents causing a fatality or release of radioactive material. As indicated in

Section 2.18, no traffic fatalities from nonradiological accidents or LCFs from radiological exposures or vehicle emissions would be expected for any of the surplus plutonium disposition alternatives proposed at the candidate sites. A description of the transportation activities is given in Section 2.4.4. Transportation risks and steps to mitigate the risks are analyzed in Chapter 4 of Volume I and Appendix L.

ZEPEDA, BARBARA
PAGE 1 OF 2



98-AMF-009

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

JUL 18 1998

JUL 27 1998

FOR: FORMAL COMMENT
DUE 7-16-98
ON SPD-EIS

PLEASE ADD
THIS 2 PAGE
LETTER

? WHY DOESN'T IAEA
MONITOR CLEANUP? 1

FROM { Ms. Barbara Zepeda
1957-254-
Seattle, Washington 98112

Dear Ms. Zepeda:

INTERNATIONAL ATOMIC ENERGY AGENCY (IAEA) ACTIVITIES AT HANFORD

Thank you for participating in the March 10, 1998, public meeting in Seattle, Washington, relating to Hanford's Fiscal Year 2000 budget. I am responding to your request for IAEA reports concerning Hanford plutonium-bearing inventories, which have been placed under the IAEA Safeguards regime through international agreement.

First, let me explain the IAEA's role at Hanford, since I believe it to be much more limited than you perceive. The IAEA routinely visits Hanford about once a month for about two days. They visit only the Plutonium Finishing Plant (PFP) complex and specifically, visit only one of the PFP buildings. Their only role at Hanford is to ensure that the quantity of plutonium-bearing materials, approximately one metric ton, placed under their safeguard regime by international agreement at the PFP is stored and monitored in a configuration which assures no possible diversion for weapons or other use. They employ a series of cameras, tamper-indicating seals, and other electronic monitoring systems to ensure that none of the plutonium has been tampered with since their last visit. As part of the IAEA and United States Agreement (INFCIRC 288), the IAEA has the option to do random selection and sampling of this inventory to further ensure that the containers still have the reported plutonium quantities.

The IAEA only verifies that the Hanford plutonium inventory under IAEA control is safe from diversion and is in the exact quantities as declared by the U. S. Department of Energy (DOE). The IAEA does not look at site safety. They do not oversee any waste operations or cleanup operations at Hanford or at any other DOE site. Their charter does not include "safety oversight," but is restricted by charter to international safeguards and nonproliferation.

To assist you further, I recommend a review of the IAEA's Information Circular (INFCIRC/288, dated December 1981), entitled "The Text of the Agreement of November 18, 1977, Between the United States of America and the Agency for the Application of Safeguards in the United States of America." This document will assist you in understanding the specific roles and responsibilities of both the IAEA and the United States. If you have internet access, you may visit the IAEA webpage at www.iaea.or.at/worldatom for information in acquiring unclassified IAEA reports.

INFCIRC/288 SHOULD BE AVAILABLE AT ALL PUBLIC
MEETINGS ON HANFORD. 2

MD002

MD002-1

General SPD EIS and NEPA Process

IAEA serves as the world's intergovernmental forum for scientific and technical cooperation in the nuclear field, as well as the international inspector for the application of nuclear safeguards and the verification measures covering civilian nuclear programs. This includes verifying compliance with international nonproliferation policies. IAEA would monitor the surplus plutonium disposition program activities except those involving classified activities. Domestic, commercial reactors that would use MOX fuel are already subject to IAEA inspection.

IAEA also has a Radioactive Waste Safety Standards Programme and an International Waste Management Advisory Committee. DOE's Office of Environmental Management represents the United States on this committee, which oversees and directs the activities of RADWASS. RADWASS has produced standards for construction, operation, and closure of disposal facilities; standards for decommissioning nuclear power plants and nuclear research facilities; and standards for deriving cleanup levels for contaminated land areas. IAEA also provides an international peer review service for radioactive waste management, the Waste Management Assessment and Technical Review Program. Information on these programs can be found on the IAEA Web site for radioactive waste management at <http://www.iaea.or.at/worldatom/inforesource/annual/anr9404.html>.

MD002-2

General SPD EIS and NEPA Process

It is not possible to have every potential source of information about plutonium disposition in each DOE reading room. Therefore, DOE strives to have, as a minimum, a copy of each of its environmental documents (e.g., this SPD EIS). For cases in which a document is not available, the DOE reading room staff will attempt to obtain a copy or provide information on how a copy can be obtained.

ZEPEDA, BARBARA
PAGE 2 OF 2

JUL 16 1998

Ms. Barbara Zepeda
98-AMF-009

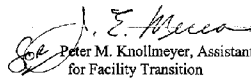
-2-

The official DOE material balance reports to the IAEA are detailed listings of Hanford plutonium under the IAEA safeguard regime by discrete location. Official IAEA inspection reports to both the State Department and DOE are similarly detailed. I regret that, due to the specificity of the information, both the IAEA and DOE reports are not available for disclosure.

I hope that this information answers your questions regarding the IAEA role at Hanford. If you have any questions regarding this letter, please contact Mr. Angel Joy, of my staff, at (509) 373-7834.

Sincerely,

AMF:PMK


Peter M. Knollmeyer, Assistant Manager
for Facility Transition

MD002

